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DTS 01/01/11

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Counsel for Defendant
Eagle Holdings LLC

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

15005 NW CORNELL LLC, and

VAHAN M. DINIHANIAN, JR.

Debtors.¹

19-31883-dwh11 (Lead Case)

19-31886-dwh11

Jointly Administered Under
Case No. 19-31883-dwh11

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871) (Case No. 19-31886-dwh11)).

1 TASHA TEHERANI-AMI, IN HER
2 CAPACITY AS THE TRUSTEE OF THE
3 SONJA DINIHANIAN GST TRUST DTS
01/01/11

4 Plaintiff,

5 v.

6 VAHAN M. DINIHANIAN, JR.; 15005
7 NW CORNELL LLC; and EAGLE
HOLDINGS LLC;

8 Defendants.
9

Adv. Proc. No. 20-03077

**STIPULATED MOTION FOR EXTENSION
OF TIME TO FILE SUMMARY
JUDGMENT MOTIONS**

10 **MOTION**

11 Counsel for plaintiff Tasha Teherani-Ami, in her capacity as the Trustee of the Sonja Dinihanian
12 GST Trust DTS 01/01/11 (the “**Trust**”) and defendants 15005 NW Cornell LLC (“**Cornell**”), Vahan M.
13 Dinihanian, Jr. (“**Mr. Dinihanian**”), and Eagle Holdings LLC (“**Eagle Holdings**,” and together with the
14 Trust, Cornell, and Mr. Dinihanian the “**Parties**”) respectfully move the Court to enter an Order in the
15 form of the attached (Exhibit 1) on a stipulated basis, extending the deadline for the Parties to file
16 Summary Judgment Motions from August 3, 2021 to August 5, 2021.

17 In support of this motion, the Parties assert the following:

18 1. On June 29, 2021, the Court held a Continued Pretrial Conference at which the Parties
19 agreed, as reflected in the Record of Proceeding (Dkt. 29), that Summary Judgment Motions would be
20 filed on or before August 3, 2021.

21 2. The Parties have discussed the deadline and have mutually agreed the date should be
22 extended by two days, from August 3, 2021 to August 5, 2021, and to respectfully convey that request
23 on a stipulated basis to the Court.

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1 3. The Parties agree the remainder of the briefing and hearing schedule should remain the
2 same.

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4 IT IS SO STIPULATED.

5 DATED: August 3, 2021

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14 Counsel for Plaintiff and Creditor
15 *Tasha Teherani-Ami, in her capacity as the*
16 *Trustee of the Sonja Dinihanian GST Trust DTS*
17 *01/01/11*

18 Dated: August 3, 2021

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 Counsel for Defendant and Debtor
 15005 NW Cornell LLC

1 DATED: August 3, 2021

2 **MOTSCHENBACHER & BLATTNER,**
3 **LLP**

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12 Counsel for Defendant and Debtor

13 *Vahan M. Dinihanian, Jr.*

14 DATED: August 3, 2021

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24 Counsel for Defendant

25 *Eagle Holdings LLC*

EXHIBIT 1

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8
9 UNITED STATES BANKRUPTCY COURT
10 FOR THE DISTRICT OF OREGON

11 In re

12 15005 NW CORNELL LLC, and

13 VAHAN M. DINIHANIAN, JR.

14 Debtors.¹

15 TASHA TEHERANI-AMI, IN HER
16 CAPACITY AS THE TRUSTEE OF THE
17 SONJA DINIHANIAN GST TRUST DTS
01/01/11

18 Plaintiff,

19 v.

20 VAHAN M. DINIHANIAN, JR.; 15005
21 NW CORNELL LLC; and EAGLE
HOLDINGS LLC;

22 Defendants.
23
24

19-31883-dwh11 (Lead Case)

19-31886-dwh11

Jointly Administered Under
Case No. 19-31883-dwh11

Adv. Proc. No. 20-03077

**ORDER GRANTING STIPULATED
MOTION FOR EXTENSION OF TIME
TO FILE SUMMARY JUDGMENT
MOTIONS**

25 ¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification
26 number, are: 15005 NW Cornell LLC (5523) and Vahan M. Dinihanian, Jr. (0871) (Case No. 19-31886-
dwh11)).

THIS MATTER came before the Court on plaintiff Tasha Teherani-Ami, in her capacity as the Trustee of the Sonja Dinihanian GST Trust DTS 01/01/11 (the “**Trust**”) and defendants 15005 NW Cornell LLC (“**Cornell**”), Vahan M. Dinihanian, Jr. (“**Mr. Dinihanian**”), and Eagle Holdings LLC (“**Eagle Holdings**,” and together with the Trust, Cornell, and Mr. Dinihanian the “**Parties**”) Stipulated Motion for Extension of Time to File Summary Judgment Motions (the “**Motion**”). The Court having reviewed the Motion, and being otherwise duly advised, now, therefore,

IT IS HEREBY ORDERED as follows:

1. The deadline for the parties to file Summary Judgment Motions is extended to August 5, 2021.

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Presented By:

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34 Counsel for Defendant
35 Eagle Holdings LLC

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on the date set forth below they caused the foregoing

3 **STIPULATED MOTION FOR EXTENSION OF TIME TO FILE SUMMARY JUDGMENT**

4 **MOTIONS** to be served via the CM/ECF system on the parties set forth below:

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01/01/11

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14 Counsel for Defendant
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15
16 Dated: August 3, 2021

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